Smart Booster
Intelligent Cellular Range Extender

July 19, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket 10-4
Amendment of Parts 1, 2, 22, 24, 27, 90 and 95 of the Commission's Rules to Improve Wireless Coverage Through the Use of Signal Boosters

On July 11, 2012, Frank Lee, Michael Millard, and Jeremy K. Raines, Ph.D., P.E. of Smart Booster met with Tom Derenge, Joyce Jones, Moslem Sawez, Becky Schwartz, and Erin Griffith all from the Wireless Telecommunications Bureau, and Bruce Romano of the Office of Engineering and Technology. Roger Noel of the WTB and Rashmi Doshi of the OET also attended via telephone conference.

The attached sides were presented at the meeting but were inadvertently omitted from Smart Booster's July 13, 2012 Notice of Ex Parte Communication.[1]

A phone number has been redacted from Slide #5 to protect subscriber privacy.

Respectfully submitted,

Jeremy K. Raines, Ph.D., P.E.

By: Jeremy K Raines, Ph.D., P.E.

Submitted via ECFS: July 19, 2012

[1] http://apps.fcc.gov/ecfs/comment/view?id=6017095955

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Parts 1, 2, 22, 24, 27, 90 and 95	)	
of the Commission's Rules to Improve Wireless	)	WT Docket No. 10-4
Coverage Through the Use of Signal Boosters	)	Released Jan 6, 2010
	)	
	)	
_____	)	

NOTICE OF EX PARTE COMMUNICATION
MILLARD/RAINES PARTNERSHIP
("SMART BOOSTER")

Smart Booster
Intelligent Cellular Range Extender

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Submitted via ECFS: July 13, 2012

On July 11, 2012, Frank Lee, Michael Millard, and Jeremy K. Raines, Ph.D., P.E. of Smart Booster met with Tom Derenge, Joyce Jones, Moslem Sawez, Becky Schwartz, and Erin Griffith all from the Wireless Telecommunications Bureau, and Bruce Romano of the Office of Engineering and Technology. Roger Noel of the WTB and Rashmi Doshi of the OET also attended via telephone conference. Smart Booster discussed the ongoing proceeding regarding the use of signal boosters for wireless services, with particular attention to the matters disclosed below.

1. The technical safe harbors, as presently envisioned in the draft Joint Proposal, do not adequately prevent or minimize the interference from cellular boosters.

2. The registration process, as presently envisioned in the draft Joint Proposal, is incapable of preventing or minimizing interference from cellular boosters and suffers other significant shortcomings, particularly those relating to purchaser compliance, churn, and resale of boosters in the secondary markets. Further shortcomings include the registration of boosters to fixed addresses when in reality, a majority are expected to operate in mobile environments. And finally, the registration process as presently envisioned will not include the millions of legacy boosters already deployed and is therefore useless for interference abatement efforts.

3. The combination of ineffective technical safe harbors and a useless registration process is an improper substitute for robust blanket licensing. Smart Booster noted its agreement with AT&T's recent ex parte communication that section 1.903(c) of the Commission rules does not provide a framework for the combination of technical safe harbors and device registration to replace blanket licensing.

4. There is no consensus for the Joint Proposal. Except for Verizon, all carriers have expressed an unwillingness to grant consent for boosters that operate on spectrum belonging to other carriers. Broadband operation is at the heart of the joint proposal and without it, there can be no consensus. As a practical matter, any consent-based

approach to broadband booster use is automatically circumvented in the event any one carrier desires to withhold consent since mobile broadband boosters operate across all carriers' licensed spectrum with impunity.

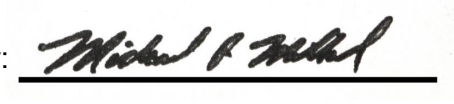
5. Smart Booster disagreed with the bureau's position concerning permissible "fleeting use" as reported in AT&T's recent ex parte notice. The huge number of subscribers who churn every day from one network to the next can be expected to take their signal boosters with them to their new carrier. This hardly constitutes "fleeting use".

6. In recognition of the foregoing, Smart Booster reaffirmed that only the geographic and spectrum controls inherent to intelligent booster technology can satisfy the carriers' desire for control akin to that afforded by the blanket licensing of handsets.

Pursuant to Section 1.1206 of the Commission's Rules, this Notice of Ex Parte Communication is being filed electronically via ECFS.

Respectfully submitted,

Jeremy K. Raines, Ph.D., P.E.
Michael Millard

By: 

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July 13, 2012
VIA: ECFS.

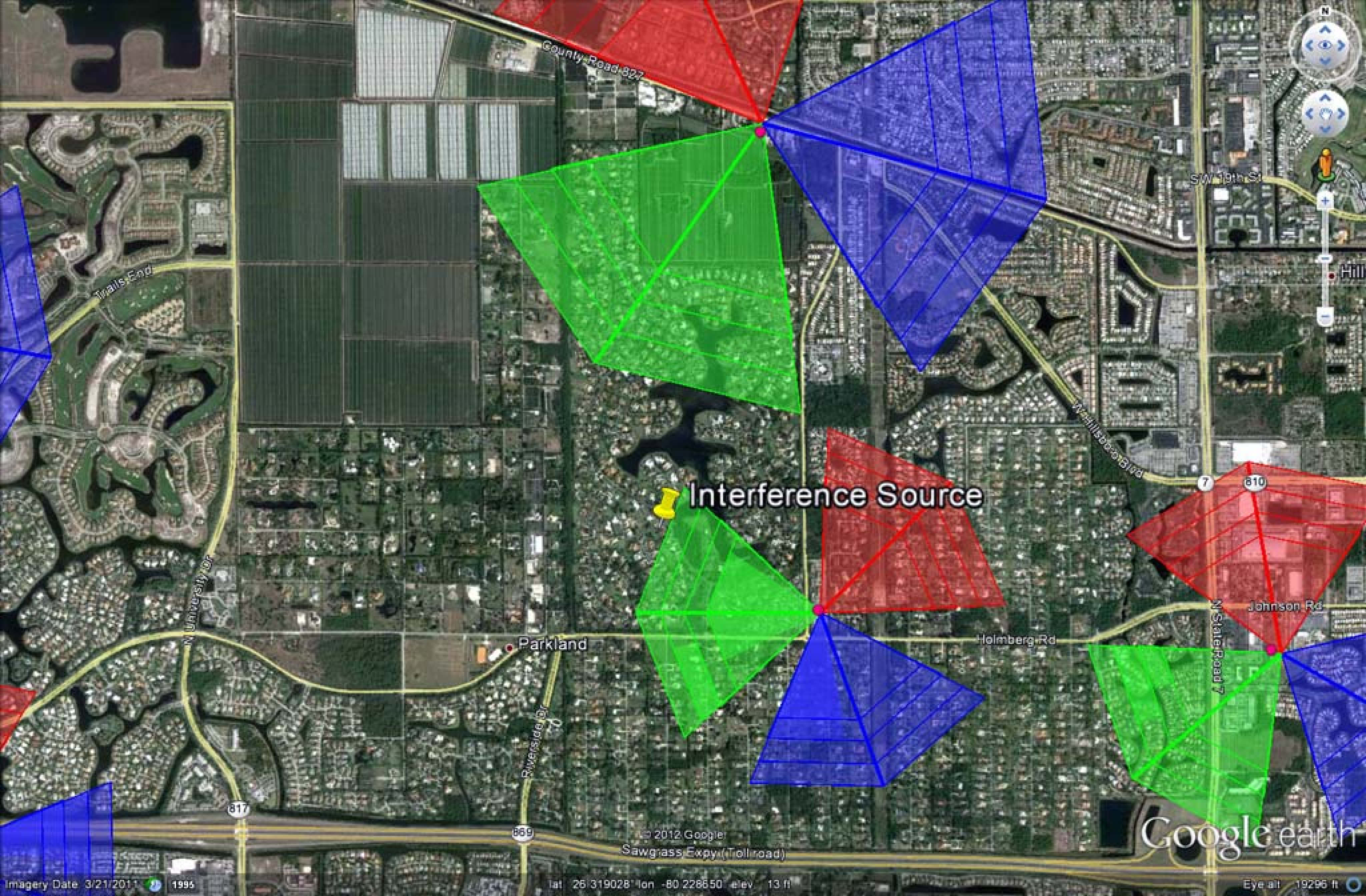
Smart Booster

Intelligent Cellular Range Extender

Ex-Parte Presentation

Federal Communications Commission

July 11, 2012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Trails End
Interference Source
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Holmberg Rd
Johnson Rd
N State Road 7
N University Dr
Riverside Dr
Sawgrass Expy (Toll road)
© 2012 Google
Google earth
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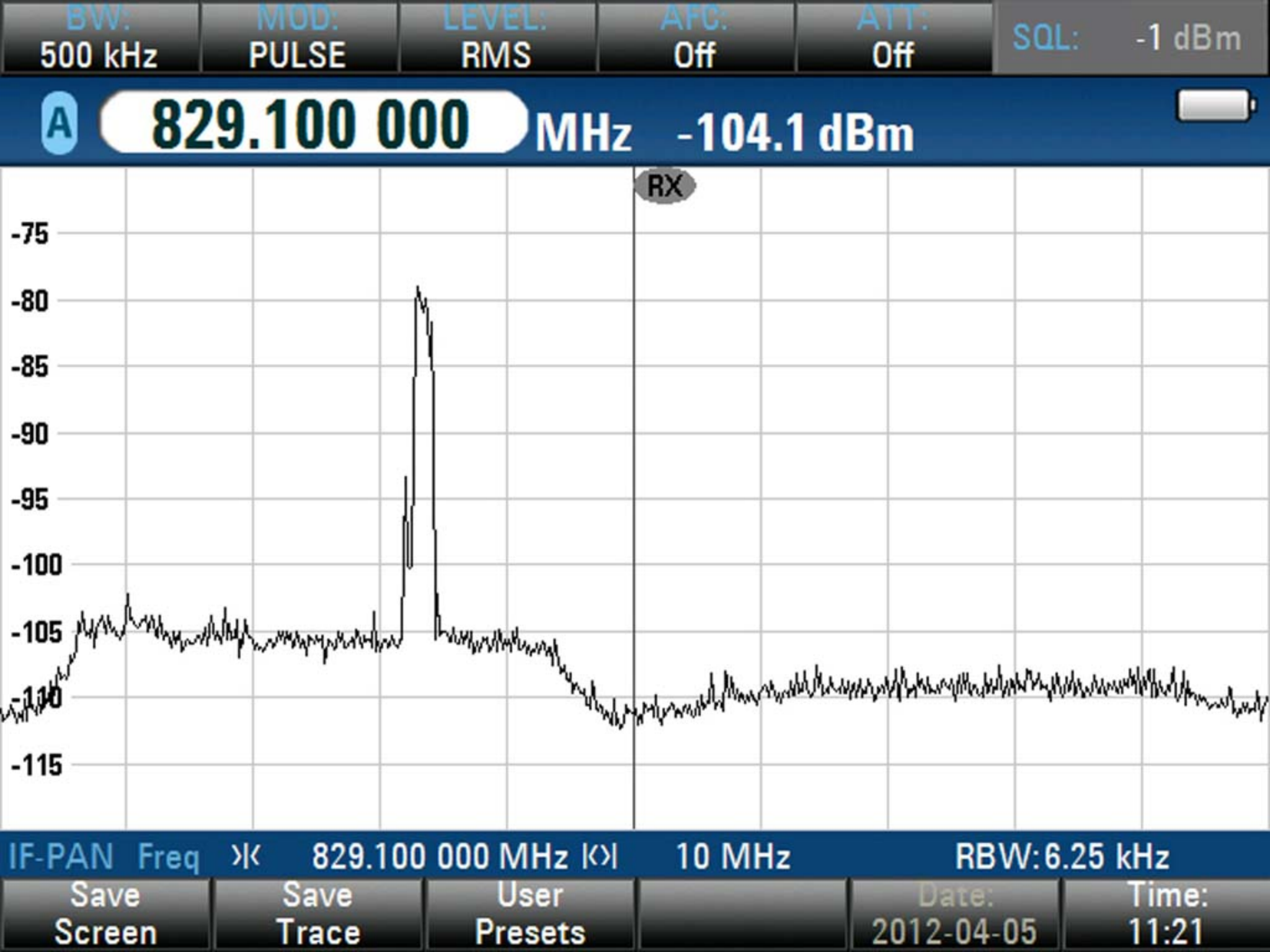
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PULSE
LEVEL:
RMS
AFC:
Off
ATT:
Off
SQL:
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A
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MHz
-104.1 dBm
RX
-75
-80
-85
-90
-95
-100
-105
-110
-115
IF-PAN
Freq
829.100 000 MHz
10 MHz
RBW:6.25 kHz
Save
Screen
Save
Trace
User
Presets
Date:
2012-04-05
Time:
11:21


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From Date: 4/4/2012
To Date: 4/6/2012
Get Graph Data
Clear Graph Before Update
Status: Done
Chart Height:
Single Column
Settings
Save Charts
Send eMail
4/8/2012 11:05 AM
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0862-C
0971-C
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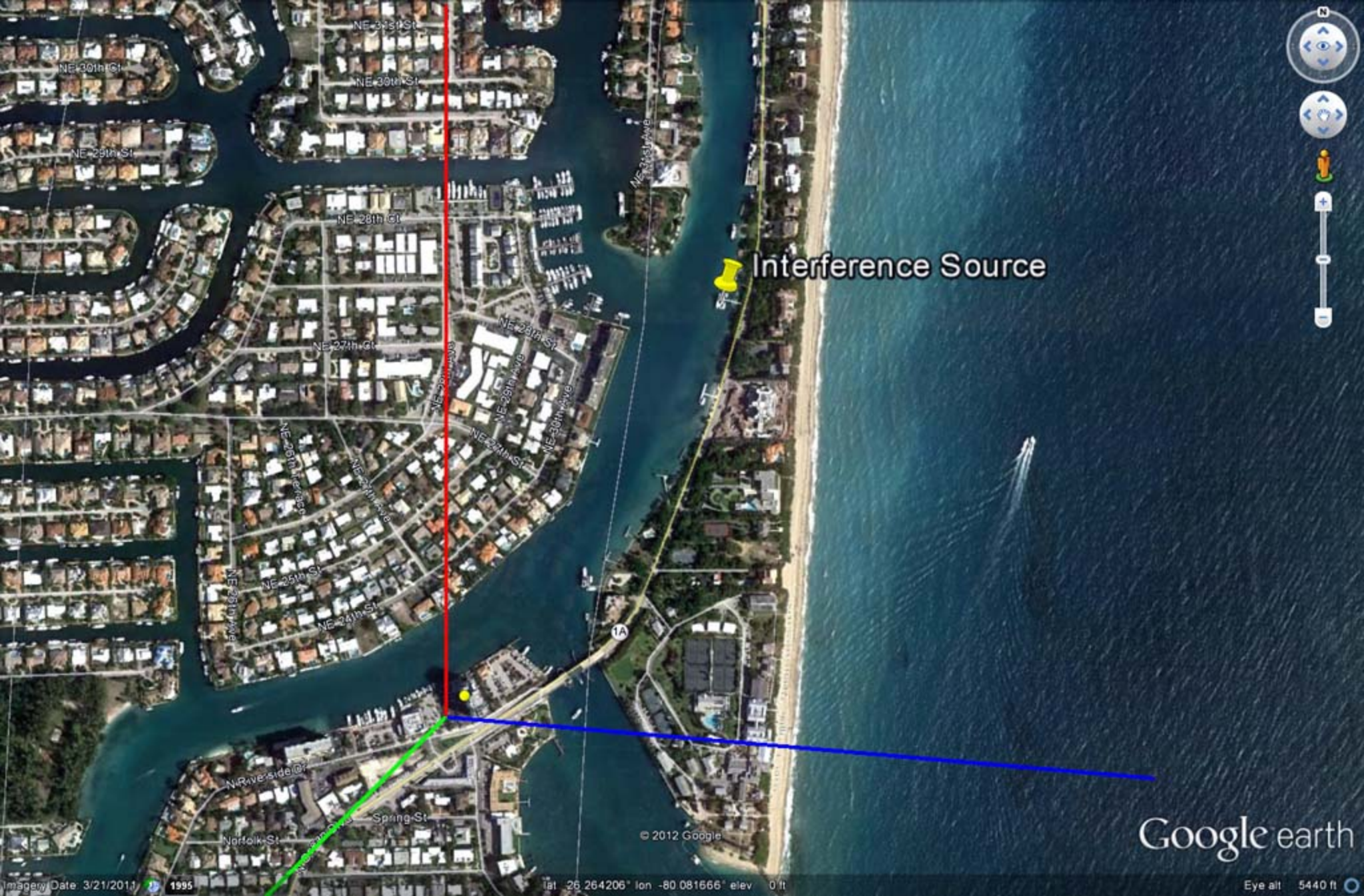
04/5 22:00

Slide #5 - Phone Number Redacted to Protect Subscriber Privacy.


Sleek® 800/1900 MHz
Smart Technology II™
Signal Booster
U.S. Patent No 7,684,838
FCC ID: PWO2B5225 IC: 4726A-2B5225
S/N: 815225G4011777205 Model: 2B5225
FCC requires to never use the cell phone in the cradle
next to your ear. See installation guide.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NE 30th Ct
NE 30th St
NE 29th St
NE 28th Ct
NE 28th St
NE 27th Ct
NE 27th St
NE 26th Terrace
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NE 24th St
NE 24th Ave
NE 26th Ave
NE 28th Ave
NE 30th Ave
NE 34th Ave
1A
N River Side Dr
Spring St
Norfolk St
© 2012 Google
Google earth
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1995
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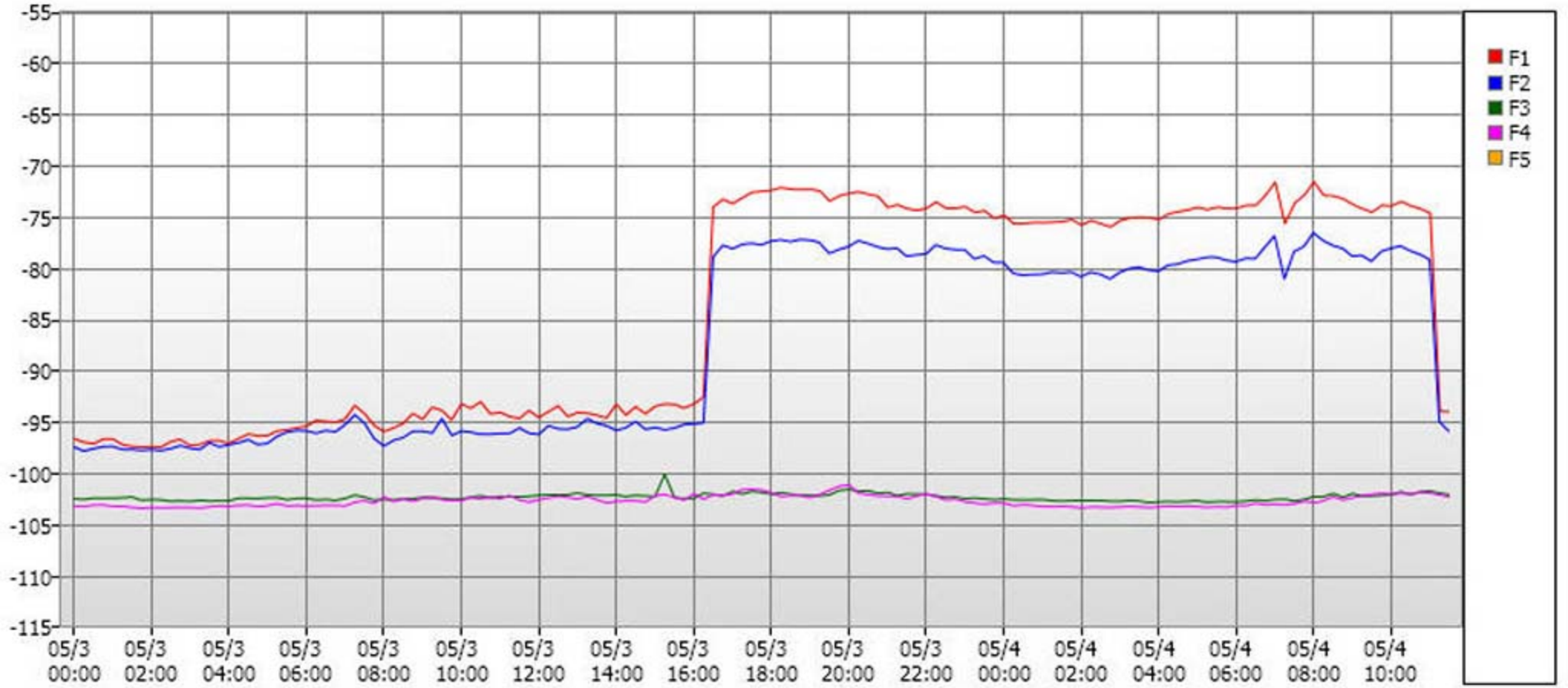
Eye alt 5440 ft

1114 - A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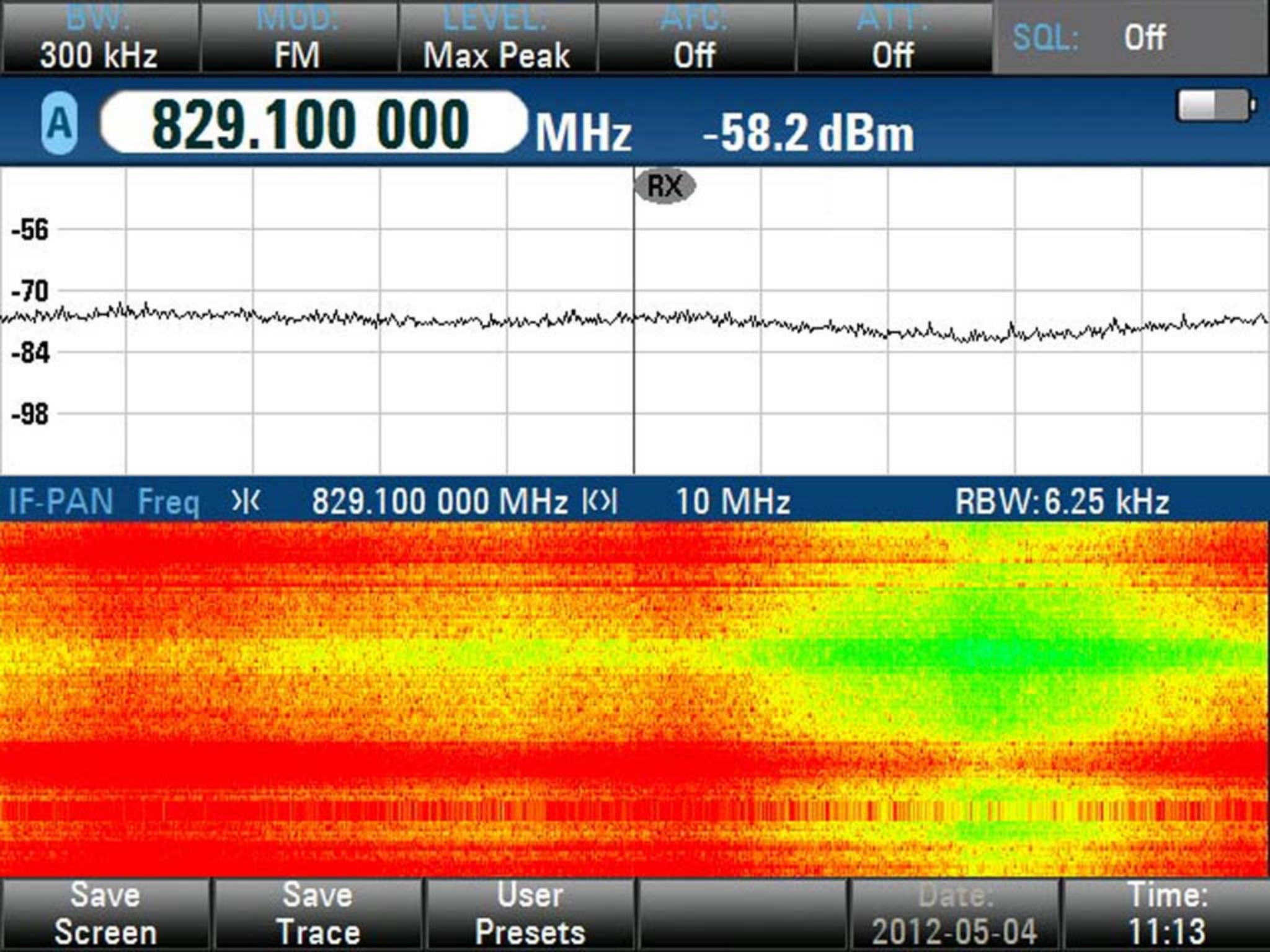
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MOD:
FM
LEVEL:
Max Peak
AFC:
Off
ATT:
Off
SQL:
Off
A
829.100 000
MHz
-58.2 dBm
RX
-56
-70
-84
-98
IF-PAN
Freq
829.100 000 MHz
10 MHz
RBW:6.25 kHz
Save
Screen
Save
Trace
User
Presets
Date:
2012-05-04
Time:
11:13


VHF/DEPTH
NMEA AMP
COURTESY LIGHTS
ELECT KITE REEL
ELECT KITE REEL
STEREO
GARMIN NMEA2K
bass
Bass Products, Inc., Salem, MA, USA
24V HELM ACC.
24V FIRE SYSTEM
24V PORT BLOWER
24V STBD BLOWER
24 VOLT HORN
24 VOLT TRIM TAB
NS 962
GARMIN
24 VOLT NAV LTS
OVER
HEAD
LIGHTS
24V DOCKING LIGHTS
24 VOLT SPOT LTS
24 VOLT FUEL TRANS
M-TECH
POWER
FAULT
ON / OFF
FUSE
CELL AMPLIFIER CONTROLLER

The Proposed Technical Safe Harbors Did Not Prevent Harmful Interference

- **Anti-Oscillation Circuitry**
- **Downlink Sensing**
- **Low Power**
- **Registration Card**

What additional safeguards are needed to prevent interference?

Registration Card + Technical Safe Harbors

DOES NOT PROVIDE

Meaningful License Regime

Registration Will Fail Because...

- Omits millions of boosters already sold
- Ignores churn
- Ignores resale in the secondary markets
- Unreliable compliance by consumers

Even if perfect, registered with whom?
The serving carrier or all carriers?

There Is No Consensus for Broadband Signal Boosters

• Verizon	Yes
• AT&T	No
• T-Mobile	No
• Sprint	No
• Metro PCS	No
• US Cellular	No
• Cincinnati Bell	No
• Blooston Licensees	No

The majority of respondents demand carrier specific signal boosters and are unwilling to approve broadband devices.

… But There Is an Implied Consensus for Intelligent Signal Boosters

• Verizon	No
• AT&T	Yes
• T-Mobile	Yes
• Sprint	Yes
• Metro PCS	Yes
• US Cellular	Yes
• Cincinnati Bell	Yes
• Blooston Licensees	Yes

Three Questions from the FCC

1. **Why doesn't the Joint Proposal get the job done?**

2. **What additional safeguards are needed such the devices cause no harm?**

3. **What does Smart Booster need to see in the rules to move forward on its development?**